

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DUNG TRUNG DUONG,	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
DUNG TRUNG DUONG,	:	
Respondent	:	CASE NO. 1-24-bk-02660-HWV

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 3rd day of March 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, y and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. The Debtor's Plan violates 11 U.S.C. § 1322(a)(2) in that the Debtor has not provided for full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. § 507. See claims 1-1 and 2-2.

2. The Trustee further objects to the Debtor's Plan subject to the Debtor providing to the Trustee a Business Debtor Certification and copies of all necessary and related documents that will enable the Trustee to file his Business Examination Report with the Court pursuant to §§1302(c), 1106(a)(3) and 1106(a)(4) of the Bankruptcy Code. More specifically, the Trustee requires the submission of the following:

- a. Insurance policies for:
 - i. Business liability; and
 - ii. Workman's compensation liability.
- b. Employers' quarterly payroll tax returns. If applicable, copies of the bank statements for six months preceding the filing.
- c. Copy of bank statements for six months preceding the filing of the petition.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 3rd day of March 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Charles E. Petrie, Esquire
3528 Brisban Street
Harrisburg, PA 17111

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee